

Universal Wastes

The hazardous waste rules ensure the proper management of hazardous wastes. Some commonly generated hazardous wastes, when properly recycled or disposed of, have little impact on the environment. To encourage environmentally sound recycling and disposal of these wastes, IDEM has reduced the regulatory burden on generators. Wastes subject to the reduced requirements are called universal wastes. One significant benefit of handling these wastes under the reduced requirements is that the wastes do not count toward the total amount of hazardous waste generated used to determine your hazardous waste generator status.

The regulations outline the requirements for Small and Large Handlers (generators) of universal wastes. In general, universal waste management standards for Small or Large Handlers are identical except for EPA notification, employee training and recordkeeping.

Universal Waste

Generator Information

Company Magenta Printing
Address Indianapolis, IN

Source Waste Batteries
Date 4/21/01

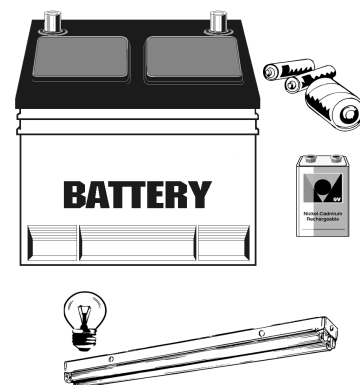
What are Universal Wastes?

There are four specific, but widely generated wastes –
batteries, pesticides, thermostats and lamps.

Universal waste batteries include Ni-Cad batteries and small sealed lead-acid batteries. These batteries are typically found in electronic and computer equipment, mobile phones, and emergency backup lighting. Other commonly generated waste batteries, such as dry cell zinc-carbon and alkaline (“long life”) batteries, generally do not contain hazardous elements of concern and are not regulated as universal wastes. IDEM, however, encourages printers to manage the long life batteries along with universal waste batteries to divert them from incinerators and landfills.

Pesticides and mercury-containing thermostats are not typically found in the print shop. But if they are generated as a waste, they can be managed as universal waste.

Fluorescent lamps are the most common universal waste. Most fluorescent lamps contain a mercury powder lamp coating. (Manufacturers now offer lamps with low mercury powder coatings. Contact your supplier or the manufacturer for more information. Some of the new lamps may be exempt from hazardous waste regulation, which could reduce your disposal or recycling costs.)



Universal Waste

Exemption

The universal waste requirements do not apply to a Conditionally Exempt Small Quantity Generator (CESQG) of hazardous waste.

If you do not generate more than 220 lbs of hazardous waste on a monthly basis, you are exempt from the requirements. IDEM recommends that you recycle, even if you are a CESQG, because it is environmentally-sound management practice. (See below.)

If you are a CESQG and elect not to follow the requirements, universal wastes (such as waste batteries, lamps and thermostats) can be discarded in the dumpster. However, your solid waste hauler must allow these wastes to be discarded in this manner. If your hauler does not accept them, you could find another hauler or voluntarily comply with the universal waste requirements.

Summary of Universal Waste Management

Requirements for Generators

Generators must manage their universal waste according to their handler status.



Summary of Generator Requirements

	Small Quantity Handler (SQH)	Large Quantity Handler (LQH)
Accumulation limit for all universal wastes.	<11,000 lbs	≥11,000 lbs
Do not dispose, dilute or treat universal wastes. Do not mix with other hazardous wastes.	✓	✓
Notify EPA and obtain ID number.		✓
Keep batteries, thermostats and mercury-containing lamps in closed compatible containers.	✓	✓
Manage leakers and broken units as hazardous waste.	✓	✓
Mark each unit or container with the words "Universal Waste", "Waste", or "Used" and the waste material (mercury thermostats, mercury-containing lamps, batteries) . For example, " Waste Batteries".	✓	✓
Must train employees on proper universal waste handling procedures.	only inform	train and keep records
Do not accumulate for more than one year. Date containers when first filling them.	✓	✓
Generator must secure agreement with receiving facility to accept universal wastes.	✓	✓
Track offsite shipments to receiving facility.		✓

How Do I Handle Large Lead-Acid Batteries?

If spent lead-acid batteries are recycled or reclaimed at a licensed facility, then you do not have to handle them as hazardous waste.

You may have Uninterruptible Power Supply (UPS) equipment for critical computer, telecommunications and production equipment. These systems are typically charged with large lead-acid batteries – similar to car batteries. These batteries are regulated under separate IDEM requirements, if sent offsite for reclamation.

Generators of large lead-acid batteries sent offsite for reclamation must do the following:



Use a licensed facility to recycle or reclaim the batteries.



Ensure that the battery cases are not damaged or leaking.

You should also do the following:



Accumulate batteries in an isolated area to prevent battery damage.

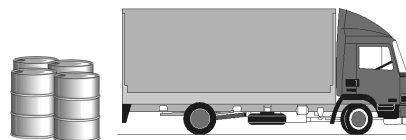


Maintain a record of the shipments made and the number of batteries sent to the reclamation facility.

How Are Universal Wastes Transported?

You can transport universal wastes using a transporter or self-transport to another universal waste generator, transporter, or licensed reclamation facility.

Because universal waste shipments destined for reclamation at a licensed facility are not tracked by manifests, they do not have to meet the hazardous waste transport requirements. Whether you use a transporter (USDOT-registered with EPA ID number) or self-transport, you are required to meet all applicable requirements for hazardous materials under the USDOT regulations. Many SQHs and LQHs can arrange for offsite transport of universal wastes with their hazardous waste transporter.



If you self-transport, you will be required to research and comply with the applicable DOT requirements for each type of waste you ship. DOT has requirements on proper shipping containers, labeling, and vehicle placards. The waste must be shipped in a company vehicle. The driver must have a Commercial Driver's License. You should also investigate whether your business insurance will cover you in the event of an accident on the road. As the generator, you are liable for any environmental releases while enroute to a reclamation facility.

How Do I Handle an Environmental Release of Universal Wastes?

SQHs and LQHs must immediately clean up any universal waste spills or residues.

If the components released are regulated as hazardous waste, then you must follow the requirements for hazardous waste disposal. You may also be required to notify IDEM, if the release exceeds any reporting thresholds. See page 76.

Some components of universal wastes are not regulated as hazardous by themselves. For example, the aluminum end caps of fluorescent lamps are not hazardous. If any of these components are spilled or released, and they are not contaminated with hazardous components, then you can discard them as municipal solid waste.